

May 22, 2014

Gerald Poliquin, Secretary of the Board National Credit Union Administration 1775 Duke St Alexandria, VA 22314-3428

Dear Mr. Poliquin,

The intent of this letter is to share my views as President of Arkansas Best Federal Credit Union regarding NCUA's proposal on Risk-Based Capital.

I understand that NCUA's primary objective is to ensure the safety and soundness of all federally insured credit unions. With an asset base of \$113 million, we will definitely be affected by the proposed regulation. We are well capitalized, and have few risk weights that would affect our capital base. It is likely that we would remain well capitalized in the proposed system. As a well capitalized credit union, we appreciate the agency's diligence in assuring that risky credit unions maintain a capital base to assure that my credit union won't be paying for their possible demise. However, I do ask that some the cost and burden of making these changes be considered. I also request that more clarification is given on why the risk weights for credit union differ from other financial institutions.

Thank you for the opportunity to comment and for your consideration.

Sincerely, Mano Means

Norma Meares

President, Arkansas Best Federal Credit Union